

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CEASERS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a CEASERS
ATLANTIC CITY HOTEL & CASINO, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC
d/b/a HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA
CASINO AND RESORT ATLANTIC CITY, MGM
RESORTS INTERNATIONAL, MARINA
DISTRICT DEVELOPMENT COMPANY, LLC
d/b/a BORGATA HOTEL CASINO & SPA, HARD
ROCK INTERNATIONAL INC., SEMINOLE
HARD ROCK SUPPORT SERVICES, LLC,
BOARDWALK 1000, LLC d/b/a HARD ROCK
HOTEL & CASINO ATLANTIC CITY, and
CENDYN GROUP, LLC,

Defendants.

: Civil Action No.: 1:23-cv-02536-KMW-EAP

**[PROPOSED] ORDER APPROVING
MOTION FOR *PRO HAC VICE*
ADMISSIONS OF VINEET BHATIA,
SHAWN L. RAYMOND, STEPHEN E.
MORRISSEY AND BENJAMIN MANNE**

This matter having been presented to the Court by Plaintiffs Heather Altman and Eliza Wiatroski ("Plaintiffs") and their attorneys Lite DePalma Greenberg & Afanador, LLC for the entry of an Order allowing the appearance *pro hac vice* of Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne for all purposes in the captioned matter, and the Court having reviewed the Certifications of Joseph J. DePalma, Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne; and it appearing that Vineet Bhatia is a partner with the law firm Susman Godfrey L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002; Shawn L. Raymond is a partner with the law firm Susman Godfrey

L.L.P., located at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002; Stephen E. Morrissey is a partner with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101; and Benjamin Manne is an attorney with the law firm Susman Godfrey L.L.P., located at 401 Union Street, Suite 3000 Seattle, WA 98101 and for good cause having been shown;

IT IS on this _____ day of _____, 2023

ORDERED, that Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne are hereby admitted *pro hac vice* for all purposes of representing Defendants Capital Investors Management LLC and Shuvan Bhaumik in the captioned matter, and it is

FURTHER ORDERED that, pursuant to Local Rule 101.1(c) Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne shall make a payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) if they have not already made contributions, and it is

FURTHER ORDERED that pursuant to Local Rule 101.1(c)(3), Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne shall make a payment of \$150.00, payable to the Clerk, United States District Court, and it is

FURTHER ORDERED that Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne shall be bound by the General and Admiralty Rules of the United States District Court for the District of New Jersey, including but not limited to the provisions of Local Rule 103.1, Judicial Ethics and Professional Responsibility, and the Local Rule 104.1, Discipline of Attorneys; and it is

FURTHER ORDERED that pursuant to Local Rule 101.1(c), Vineet Bhatia, Shawn L. Raymond, Stephen E. Morrissey and Benjamin Manne shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey Court Contingency Fee Rule, Rule 1:27-7, as amended.

SO ORDERED:

Honorable Elizabeth A. Pascal, U.S.M.J.